

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

STATE OF MARYLAND,

V.

Case No.: C-10-CR-19-000604/1473

AV

ERNESTO TORRES

Defendant

MOTION FOR THIRD AMENDED PROTECTIVE ORDER,
STATE CONSENTS

COMES NOW, the Defendant, ERNESTO TORRES, by and through his attorneys, MARGARET A. TEAHAN and ETHRIDGE, QUINN, KEMP, ROWAN & HARTINGER and hereby moves this Honorable Court to sign the attached protective Order regarding Defendant's 00001-01459. For cause, the Defendant avers the following:

1. The Records contained in Defendant's 00001-01459 contain information which the parties stipulate is confidential medical information.
2. Subject to a Second Amended Protective Order signed by the Court on May 21, 2021, the Defendant has disclosed to the State and Court Defendants 00001-01381 containing records of the Defendant.
3. Defendant issued a subpoena to Spring Grove State Hospital to obtain updated records of the Defendant between May 11, 2021 and October 5, 2021.
4. Defendant would like to disclose Defendant's 01382-1459 to the State pursuant to a third amended protective order.
5. The State consents to the Court signing the attached protective order regarding

the updated disclosure. .

ETHRIDGE, QUINN, KEMP,

ROWAN & HARTINGER

By /s/ Margaret Teahan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of November, 2021 a copy of the foregoing Motion for Protective Order, State Consents was served via the MDEC electronic filing system on the Office of the State's Attorney for Frederick County.

/s/

Margaret A. Teahan